ORIGINAL

SOUTH WESTERN Power Group II, LLC



AR Energy Company - Alliance Builder
AZ CORP COMMISSIONE
DOCKET CONTROL

2013 DEC 23 PM 12 18 Docket No. L-00000BB-01-0118-00000

December 23, 2013

Arizona Corporation Commission

DOCKETED

Mr. Steven M. Olea Director Utilities Division Arizona Corporation Commission 1200 West Washington Phoenix, Arizona 85007

DEC 2 3 2013



Subject:

Bowie Power Station, L.L.C.

2013 Letter of Self-Certification

(Decision Nos. 64625, 64626, 69339, 70588 and 71951)

Dear Mr. Olea:

Pursuant to Condition No. 24 of Decision No. 64625, Condition No. 11 of Decision No. 64626, and Bowie Power Station, L.L.C. ("Bowie") submits herewith this Letter of Self-Certification ("Letter") for the year 2013.

BACKGROUND

On March 7, 2002, the Arizona Corporation Commission ("ACC") granted Bowie two Certificates of Environmental Compatibility in Decision Nos. 64625 (power plant) and 64626 (transmission project), collectively, the "CECs".

The ACC granted Bowie an extension on the terms of the CECs on February 20, 2007 in Decision No. 69339. This decision extended the terms of the CECs through December 31, 2010.

On November 1, 2010, the ACC granted Bowie a second extension on the terms of the CECs in Decision No. 71951. This decision extended the terms of the CECs through December 31, 2020.

In addition, Bowie received approval from the Commission for an amendment to Decision No. 64626 that adjusted the alignment of Bowie's interconnecting double-circuit 345 kV transmission line. The nature of this amendment is set forth in Decision No. 70588, dated November 6, 2008.

This Letter does not repeat reports of compliance with Conditions that have been performed and documented in past Letters filed with the Commission. Conditions contained in the CECs relevant to the plant and transmission line's construction and operations are similarly not addressed herein.

2013 ACTIVITY ON PRE-CONSTRUCTION CONDITIONS

Condition No. 1B of Decision No. 64625 provides that:

[Bowie will comply with] "all applicable air quality control standards, approvals, permit conditions and requirements of the Arizona Department of Environmental Quality ("ADEQ") and/or other State of Arizona or Federal Agencies having jurisdiction..." (Page 3).

And, Condition No. 1 of Decision No. 64626 provides that the:

"Applicant shall comply with all existing applicable air and water pollution control standards and regulation, and with all existing applicable ordinances, master plans and regulation of the State of Arizona, Cochise County and Graham County, the United States of America, and any other governmental entities having jurisdiction." (Page 3).

On September 24, 2013 Bowie submitted a new Class I Air Quality Application (No. 58787) to the ADEQ for a 500 MW (nominal) natural gas-fired combined cycle power plant. The ADEQ provided Bowie a notice that the application was administratively complete on September 27, 2013. The combined cycle power plant will be permitted with newly designed General Electric 7FA Model 4 Turbines with fast start technology. This advancement of turbine technology will set the bar in the desert southwest with the lowest air emissions and achieve EPA's new Greenhouse Gas Standards. The Class I permit is anticipated to be issued by ADEQ in 2014.

Condition No. 3 of Decision No. 64626 provides that:

"Within 45 days of securing complete easements or rights-of-way, for the entire alignment of the transmission lines hereby authorized, Applicant shall erect and thereafter maintain signs providing public notice that such easements and rights-of-way are the site of future transmission lines. Such signs shall be (i) no smaller than a standard highway information sign, and (ii) prominently placed at reasonable locations in close proximity to the proposed centerline of the transmission alignments which are accessible to the public..." (Page 4).

The Applicant continues to maintain the signs that have been placed at five sites located within the area of the centerline of the 345 kV transmission line.

Condition No. 7 of Decision No. 64625 provides that:

"Prior to construction of any facilities, Applicant must provide the Commission with technical study evidence that sufficient transmission capacity exists to accommodate the full output of the plant and that the full output of the plant shall not compromise the reliable operation of the interconnected transmission system. The technical studies shall include a power flow and stability analysis report showing the effect of the plant on the existing Arizona electric transmission system. The technical study report(s) shall document both physical flow capability as well as contractual schedule capability to deliver full plant output to its intended market." (Pages 6-7).

SWPG and Tucson Electric Power ("TEP") entered into an Interconnection Facility Studies Agreement on October 12, 2012. The Interconnection Facilities Study will provide a project description, preliminary design and engineering, cost estimate, and schedule for required facilities to interconnect Bowie's Large Generating Facility to TEP's transmission system at the proposed Willow 345 kV Substation between TEP's Greenlee and Winchester substations. TEP provided the Facility Study for the Willow 345 kV Substation to SWPG on October 29, 2013. Bowie and TEP are in the process of executing a Large Generator Interconnection Agreement ("LGIA"). The LGIA should be completed by March 2014.

Condition No. 8 of Decision No. 64626 provides that:

"Prior to construction of any Project transmission facilities, Applicant shall provide the Commission with copies of the transmission interconnection agreement(s) it ultimately enters into with any transmission provider(s) with whom it is interconnecting within 30 days of execution of such agreement(s).

Bowie will file the LGIA executed between the Bowie and TEP with Docket Control within 30 days of such execution.

Condition No. 9 of Decision No. 64626 provides that the:

"Applicant shall continue to participate in good faith in State and regional transmission study forums, including the Central Arizona Transmission Study, to identify and encourage expedient implementation of transmission enhancements to reliably deliver power from the Project to the WSCC transmission grid." (Page 7).

And, Condition No. 10 of Decision No. 64625 provides that the:

"Applicant shall continue to participate in good faith in state and regional transmission study forums to identify and encourage expedient implementation of transmission enhancements, including transmission cost participation as appropriate, to reliably deliver power from the Project throughout the WSCC grid in a reliable manner." (Page 7).

And, Condition Nos. 18A and 19Da of Decision No. 69339 provides that the:

"Applicant shall participate in Arizona subregional transmission planning forums such as SWAT (Southwest Area Transmission) and SATS (Southeast Area Transmission Study) on a regular basis and participate in each Biennial Transmission Assessment performed by the Commission." (Page 5 and 6).

Bowie continues its active involvement in regional transmission planning organizations, including WestConnect and SWAT, and SWAT's subcommittees, particularly the Arizona Transmission Subcommittee that was created to replace the Central Arizona Transmission and Southeast Area Transmission subcommittees. Additionally, through its owner, SWPG, Bowie remains a Class Three Member in good standing in the Western Electricity Coordinating Council.

Condition Nos. 18B and 19Db of Decision No. 69339 provides that:

"Applicant shall document in its annual self-certification letter all steps taken in the previous year to seek a contract for capacity and energy production out of its plant. This should include participation in any and all generation adequacy or planning workshops or assessments sponsored by the Commission." (Pages 5 and 6). Bowie continues to discuss the need for additional base load generation for Arizona's energy needs with the state's load-serving entities notably Arizona Public Service, Salt River Project and TEP. This effort includes regular participation in the commission's transmission planning and integrated resource planning proceedings and workshops.

For example, TEP announced a Request for Proposals ("RFP") for a Power Plant Purchase on May 10, 2013. SWPG submitted a proposal to TEP regarding the first 500 MW block of the Bowie Power Station on June 25, 2013. SWPG was notified on August 9, 2013 that the proposal was not selected by TEP for further discussions.

SUMMARY

Our regional economic recession continues to be persistent, affecting residential and commercial load growth, although we are beginning to see some signs of recovery in our state. This has delayed the forecasted commercial operation date for Bowie's first project phase, nominally 500 megawatts of combined-cycle combustion turbine operations. Bowie will continue to monitor the economic environment and remains in regular contact with Arizona's load-serving entities regarding their future energy and capacity needs to serve their customers. This includes regularly participating in RFPs issued by Arizona utilities.

This Letter serves to certify that Bowie remains in full compliance with all applicable Conditions imposed by the Commission regarding the CECs contained in Decision Nos. 64625, 64626, 69339, 70588 and 71951.

Please direct any questions that may arise from this report to the undersigned at (602) 808-2004.

Sincerely,

Tom C. Wray

Tombulay

Manager, Transmission and Generation Projects

Cc: File

Docket Control (13 copies)
David Getts, Southwestern Power Group
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